

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

CR 19-40018

Plaintiff,

REDACTED INDICTMENT

vs.

Wire Fraud

CRYSTAL NELSON,

18 U.S.C. § 1343

Defendant.

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The Grand Jury charges:

Counts 1 – 4.

A. Introduction:

Beginning on or about December 2013, and continuing through September 2018, all dates approximate and inclusive, in the District of South Dakota and elsewhere, the Defendant, Crystal Nelson, devised and intended to devise a scheme and artifice to defraud and to obtain money and property from others by means of false and fraudulent pretenses, representations, and promises, and caused communications to be sent and did knowingly use and cause communications to be transmitted in interstate commerce, by means of electronic wire communications, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice to defraud.

B. Object of the Scheme and Artifice:

The object of the Defendant's scheme and artifice to defraud was to unjustly enrich herself by obtaining fraudulent funds.

C. Manner and Means of the Scheme and Artifice:

1. From approximately 2009, through on or about September 6, 2018, Defendant was the bookkeeper for McCrossan Boys Ranch (MBR), located near Sioux Falls, South Dakota. In this capacity, Defendant was responsible for managing and reconciling various MBR accounts. Defendant's duties included handling MBR's payroll system, managing MBR's client fund account, and paying MBR's credit cards.

2. On multiple occasions during the relevant time period, Defendant falsely and fraudulently inflated her own payroll checks and then used the funds for her own purposes. Defendant disguised her theft by debiting money from the payroll account and crediting the operating account, and by creating false documentation for MBR's payroll binder.

3. On multiple occasions during the relevant time period, Defendant wrote checks from MBR's client fund account payable to cash, cashed the checks, and then used the funds for her own purposes. Defendant gave these checks the appearance of regular MBR client fund expenditures.

4. On multiple occasions during the relevant time period, Defendant used MBR's credit card without authority for her own personal expenses.

D. The Wire Transmissions:

5. Beginning on or about December 2013, and continuing through September 2018, all dates approximate and inclusive, in the District of South Dakota and elsewhere, the Defendant, having devised the above-described scheme and artifice to defraud, did knowingly use and cause communications to be transmitted in interstate commerce, by means of electronic wire communications, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice to defraud.

6. On or about the dates listed below, the Defendant caused, among others, the following wire communications to be sent, with each such transmission constituting a separate count:

Count	Date of Wire Transmission	Type of Wire Transmission	Description of Interstate Wire Transmission
1	February 3, 2017	ACH payroll payment for \$1,536.38	From First Premier Bank in Sioux Falls, SD to Great Western Bank in Sioux Falls, SD, through the Electronics Payment Network in New York.
2	September 1, 2017	ACH payroll payment for \$3,552.87	From First Premier Bank in Sioux Falls, SD to Great Western Bank in Sioux Falls, SD, through the Electronics Payment Network in New York.
3	January 19, 2018	ACH payroll payment for \$3,396.29	From First Premier Bank in Sioux Falls, SD to Great Western Bank in Sioux Falls, SD, through the Electronics Payment Network in New York.

Count	Date of Wire Transmission	Type of Wire Transmission	Description of Interstate Wire Transmission
4	April 13, 2018	ACH payroll payment for \$3,439.76	From First Premier Bank in Sioux Falls, SD to Great Western Bank in Sioux Falls, SD, through the Electronics Payment Network in New York.

Defendant's actions were all in violation of 18 U.S.C. § 1343.

A TRUE BILL:

"REDACTED"

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Foreperson

RONALD A. PARSONS, JR.  
United States Attorney

By: 